## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TENNESSEE EASTERN DIVISION AT JACKSON

WILLIAM GRIFFIN AND BILLIE GRIFFIN,	)	
Plaintiff,	)	
v.	)	Case 1:21-cv-02818
AMERICAN SELECT INSURANCE	)	
COMPANY,	)	
Defendant.	)	

## EXPERT REPORT PURSUANT TO FED. R. CIV. P. 26(a)(2)

A. Name and contact information for expert:

David Herring WriteLoss, Inc./RiseDocument, Inc. (850) 460-0238

david@writeloss.com

a. Complete statement of all opinions the witness will express and the basis and reasons for them;

Will present a list of damages and cost to repair damages based on inspection, measurements and photos taken during inspection by Joe Segarra on May 5, 2020.

b. The facts or data considered by the witness in forming them;

Facts are gathered from data received from the plumber, inspection photos, inspection notes, and Xactimate estimating practices.

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c. Any exhibits that will be used to summarize or support them;

Photos/videos of the Property, Plumbing Report and Estimate, Xactimate Estimate.

d. The witness's qualifications, including a list of all publications authorized in the previous 10 years;

See attached CV.

e. A list of all other cases in which, during the previous 4 years, the witness has testified as an expert at trial or by deposition;

See attached CV.

f. A statement of the compensation to be paid for the study and testimony in the case;

\$225.00/hour outside of deposition and court. \$275.00/hour for deposition and court attendance.

**David Herring** 

## **CERTIFICATE OF SERVICE**

I hereby certify that on August \_\_\_\_\_, 2022, a true and correct copy of the foregoing was delivered to all counsel for parties at interest in this cause via U.S. mail and electronic mail:

JAMES R. TOMKINS, 11161 SMITH & TOMKINS 25 Century Boulevard, Suite 606 Nashville, TN 37214

(615) 256-1280 jtomkins@smithtomkins.com

Attorney for Defendant

/s/ Alex S. Fisher

Alex S. Fisher (BPR #31391)

MORGAN & MORGAN – NASHVILLE

1 - HERRING CV



#### **EXECUTIVE SUMMARY**

David Herring is the founder and President of WriteLoss, Inc. and owner of RiseDocument, Inc. The company and its related companies provided estimation services totaling \$ 6.5 billion in property damage claims in 2017, \$8.9 billion in claims in 2018 and \$10.5 billion in claims in 2019. Mr. Herring serves a building consultant, senior estimator, testifying and non-testifying expert witness, an appraiser and as an umpire in the field of first party property damages claims. As the President of the company, David oversees the management staff and the field and estimating staff who generate the Xactimate reports and estimates the company generates for the clients the company serves. WriteLoss provides field inspection and estimating services on residential and commercial property damages claims to clients including public adjusters, attorneys and restoration and remediation contractors and to the residential and commercial customers that those clients serve. Mr. Herring has consulted on claims ranging from simple residential claims of \$50,000 -\$200,000 to commercial claims over \$50 million. He has served as a testifying expert in federal court cases in New York, Virginia and Florida and as an expert witness in state court litigation throughout the United States but primarily Florida. David serves an appraiser for insured clients when appraisal is requested or required under an insurance policy and as an umpire to resolve disputes between appraisers.

#### **Professional Experience:**

#### WriteLoss Inc. - CEO / Founder - 2015 - Present

Oversees and manages a company that performs Xactimate claims estimation consulting services for contractors, adjusters and attorneys. The company provides claims estimation and consulting services and serves nearly 300 companies in North America. The company serves essential as a back office to the clients the company represents allowing the clients to outsource their Xactimate services and grow their businesses by handling more claim volume. WriteLoss manages the flow and volume of claims that these clients handle and outsource, by providing Xactimate estimating services for damaged properties in the aftermath of natural disasters such as hurricanes, fires and other similar types of occurrences. David Herring performs services as a loss consultant, as a non-testifying and testifying expert witness for attorneys, public adjusters and/or for insured clients whose claims have been denied or otherwise have not been paid and litigation is brought to recover from their insurance carriers.

#### **Building Consulting and Estimation Services 2007-2015**

Developed business model and performed claim estimation and consulting services for contractors, adjusters and attorneys that ultimately became WriteLoss, Inc. Created services model that provided a means for customers to streamline and improve their Xactimate claims estimating and claims writing services, by outsourcing their work to an outside consultant with specialized Xactimate training and field knowledge and experience that most customers do not possess who write their own Xactimate estimates.

#### CDT/ AMCAT GLOBAL - Construction Director / Florida CAT Director 2005-2009

Employed as a Construction Director at a large construction and disaster mitigation services company. As the Director, Mr. Herring built and maintained an arm of the company to produce \$47 million annually in mitigation and construction Services.



#### Direct Project Management and Estimation – 2001 – 2005

Worked as a large loss management and estimation consultant who performed 100% field work. Provided claims support to customers in the construction field for claims with a value of 10-30 million in estimation claims per year.

#### **EDUCATION AND CERTIFICATIONS**

- Bachelors in Business Management /Louisiana College, Pineville LA 1993
- Bachelors in English / Louisiana College, Pineville LA 1993
- Bolton Leadership Scholarship Earned as an undergraduate for leadership activities.
- LEED Standards Origination Committee Set standards for LEED certifications of commercial structures.
- Xactimate Certification 28 Certification Level 3

#### **Litigation Expert History:**

• Daniel Robles vs AIG (2014)

Fire claim which resulted from contractor damage.

Cohen and Grossman Attorneys at Law 350 N Lake Destiny Rd Maitland FL 32751

Designated as a testifying expert by Plaintiff's counsel. Case settled prior to deposition of expert.

Ramada Inn Partners of TX vs Liberty Mutual (2015)

Testifying expert for the Plaintiff, specifically for the justification of the HVAC and roof damage components of the loss.

Shannon Loyd Law Firm PLLC 12703 Spectrum Drive STE 201 San Antonio Texas 78249 210-625-5945

#### David Herring was deposed as Plaintiff's expert. Case settled prior to trial.

• Ronnie Phillips vs State Farm Insurance Company (2016) - Confidential Settlement in Effect

Expert for the Plaintiff's attorneys. Provided expert consulting and testimony after inspecting and assessing 61,000 State Farm files. These files provided the basis of the complaint and subsequent settlement.

Osborn, Hine, Yates & Murphy LLC 3071 Lexington Ave

RiseDocument, Inc. 53 Sonata Street, Freeport, FL 32439 david@risedoc.com



Cape Girardeau MO 63701

#### Case settled prior to expert being deposed or testifying.

• Korleski vs Ironshore Insurance Company (2016-2018)

2016 Water damage claim underpayment claim for an 11,000 SF residential structure in rural North West Florida. Non-testifying expert for Plaintiff's counsel, case was in litigation and in, court ordered appraisal when settlement was reached utilizing expert's damages calculations.

Michael Schofield, Esquire Clark Partington

Office: (850) 432-9200 | Fax: (850) 432-7340

125 East Intendencia Street Pensacola, Florida 32502

Email: mschofld@clarkpartington.com

#### Case settled at mediation prior to David Herring being designated as expert witness.

• 51 Greene Street Condominium v. Admiral Indemnity Company (2016 to present)

2016 Fire Loss with active litigation in Federal District Court for the Southern District of New York. Retained as testifying expert for the Plaintiff - estimation and expert reports submitted. Deposition of David Herring as Plaintiff's expert witness was conducted on December 7, 2018.

Plaintiff's Counsel:
David Karel, Esq.
Wilkofsky, Friedman, Karel & Cummins
299 Broadway, 17<sup>th</sup> Floor
New York, New York 10007
(212) 285-0510

Email: dbkarel@wfkclaw.com

#### The case settled through mediation.

• Danville Commercial Industrial Storage v. Selective Insurance Company (2016 to 2020)

Roof collapse of commercial storage facility located in Danville, VA. Retained as testifying expert for federal court litigation on behalf of the Plaintiff. Estimation reports submitted. Expert has not been deposed.

Anthony H. Monioudis, Esq. 341 Main Street, Suite 201 Danville, VA 24541

E-Mail: anthony@ahmplc.com

Litigation was active in Federal Court in Virginia. Expert reports were submitted for the litigation for

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david@risedoc.com



use by Plaintiff's counsel. David Herring was not deposed. The case settled at mediation.

• Boyd vs. Universal Property (2017-2018)

2016 Windstorm damage claim being litigated for claim denial. Non-testifying expert of the Plaintiff's counsel.

Attorney Mitchell E. Jacobs Mitchell E. Jacobs, PA 11931 SW 52 Street Cooper City, FL 33330 (7860 271-6604 Email mitchell@mejpa.com

Case settled at mediation prior to David Herring being designated as expert witness.

Hollywood Beach Resort Owners vs. Lloyd's of London (2018 to 2019)

Retained as building loss consultant and non-testifying expert for insured for Hurricane Irma Damage. Estimates were completed and submitted to the carrier in support of the claim for 522,000 square foot historic hotel and condominium on Hollywood Beach.

Javier Delgado, Attorney - Licensed in FL, TX, N.Y., D.C - Merlin Law Group 222 Lakeview Ave, Suite 1250 West Palm Beach, FL. 33401 Tel: (561) 855-2120

Fax: (561) 249-1283

JDelgado@merlinlawgroup.com

Retained as testifying expert. Prepared expert reports for use by Plaintiff's counsel. Case settled at mediation prior to David Herring being deposed in the matter.

Hampton Palm Beach Condominium Association vs Travelers Insurance Company (2018 to 2019)

Retained as building loss consultant and testifying expert for insured for Hurricane Irma. Damage estimates were completed and submitted to the carrier in support of the claim for hurricane damage to the condominium.

Javier Delgado, Attorney - Licensed in FL, TX, N.Y., D.C.- Merlin Law Group 222 Lakeview Ave, Suite 1250
West Palm Beach, FL. 33401
Tel. (561) 855 2120

Tel: (561) 855-2120 Fax: (561) 249-1283

JDelgado@merlinlawgroup.com

Prepared expert reports for use by Plaintiff's counsel. Case settled at mediation prior to David Herring being deposed in the matter.



Collins vs Universal Property & Casualty (2018)

Residential fire loss. Designated as testifying expert for the Plaintiff.

Tyler & Hamilton, P.A. Midtown Centre, Building 4000 4811 Beach Boulevard, Suite 200 Jacksonville, Florida 32207 (904) 398.9999 Telephone (904) 398.0806 Facsimile tandhpa@bellsouth.net

Prepared expert reports for use by Plaintiff's counsel. Case settled at mediation prior to David Herring being deposed in the matter.

Maywalt vs AIG (2018)

Completed litigation in Midlothian Virginia. Retained as testifying expert for the Plaintiff - estimation and reports submitted. Case settled prior to expert being deposed.

Nicholas H. Hantzes Hantzes & Associates 1749 Old Meadow Road Suite 308 McLean, Virginia 22102 (703) 378-5000 (703) 448-4434 (fax) Hantzeslaw.com (website)

 Prime Alliance/Palm Springs Mile/ Palm Springs Lake Worth v. Employers Insurance Company of Wausau (2018 to 2020)

Retained as a loss consultant for a public adjuster for two large commercial claims for damages to two outdoor shopping mall properties damaged from Hurricane Irma. Also retained by owner of properties on a limited basis to perform aerial thermography and write reports in support of roof damage claims asserted by the public adjuster.

Frank Winston, Esquire – Plaintiff's Counsel Frank P. Winston, Esq. Lerner, Arnold & Winston, LLP 475 Park Avenue South, 28<sup>th</sup> Fl. New York, New York 10016 (212) 686-4655 Fax (212) 532-3301 fwinston@lawpartnersllp.com

David Herring was deposed at an Examination under Oath (EUO) as a representative of the insured. The deposition was held on July 18, 2019. There was dispute during the deposition whether the deposition was a EUO, or the deposition of an expert witness. The case settled prior to David Herring being designated as Plaintiff's expert witness.

Winston Towers 600 Condominium Association, Inc. v. Westchester Surplus Lines, et al et al (2018 to

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david@risedoc.com



2019)

Retained as a loss consultant for a public adjuster for condominium building damaged from Hurricane Irma.

Joshua Solomon Florida Public Adjusting, Inc. 2020 NE 163<sup>rd</sup> Street, Suite 103 North Miami Beach, FL 33162 josh@flapublicadjusting.com 786-537-7753

David Herring was not designated as Plaintiff's expert witness. The case settled at mediation prior to David Herring being designated as an expert witness.

Redeeming Word Church v. Arch Specialty Insurance Company (2019 to 2020)

Retained as a loss consultant for a public adjuster for condominium building damaged from Hurricane Irma.

Wade Tutt
Paramount Loss Adjusting, Inc.
430 Erie Street
Suite 601
Chicago, IL 60654
wtutt@paramountadjusting.com

David Herring was not designated as Plaintiff's expert witness by Plaintiff's counsel. The case settled at mediation prior to David Herring being designated as an expert witness.

• Cameron School District v. Oklahoma School Insurance Group (2019 to present)

Retained as expert for Plaintiff's counsel for state court litigation in Oklahoma for a fire loss claim which has not been properly paid by the insurance carrier.

Mark Engel, Esq. Mansell, Engel and Cole 204 N. Robinson Ave., 21<sup>st</sup> Floor Oklahoma City, OK 73102

David Herring was deposed as Plaintiff's corporate representative providing testimony at an Examination Under Oath (EUO) by the Insured. David Herring has prepared expert reports for use by Plaintiff's counsel. David Herring testified as Plaintiff's expert witness. The case was settled during a jury trial when David Herring was scheduled to testify as Plaintiff's expert witness. The jury was read David Herring's expert witness deposition testimony and the case settled just prior to his testimony as Plaintiff's expert witness at trial.

All Repair and Restoration dba ALL DRY USA Assignment of Benefits from Marianna Glass Company v.
 Ohio Insurance Company (2020 to present)

Consumer Law Office Mordechai Breier, Esq.

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53 Sonata Street, Freeport, FL 32439
david@risedoc.com



633 N.E. 167 Street Suite 725 North Miami Beach, FL 33162 <u>mlb@myconsumerlawoffice.com</u> (305) 940-0924

Retained as expert witness for the Plaintiff in a case in Federal Court for the Northern District of Florida. David Herring has prepared expert reports for use by Plaintiff's counsel. Expert has not yet been deposed in the matter. Litigation is ongoing.

Shirkmere Apartment Building v. Chubb Insurance Company (2019 to present)

Retained as expert for Plaintiff's counsel for state court litigation in Wichita, Kansas for a fire loss claim which has not been properly paid by the insurance carrier.

Russ Hazlewood, Esq. Graybill & Hazlewood LLC 218 N. Mosley Street Wichita, KS 67202 info@graybillhazlewood.com 316-266-4058

David Herring's company representatives prepared expert reports for use by Plaintiff's counsel. Expert has not yet been deposed in the matter. Litigation is ongoing and the matter is set for trial.

• Jones v. Federated National Insurance Company (2019 to present)

Retained as expert for Plaintiff's counsel for state court litigation in Florida. Case involves a covered insurance claim from Hurricane Michael.

Chris Aguirre, Esq. Insurance Litigation Group, P.A. 1500 NE 162nd Street North Miami, FL 33162 <a href="mailto:chris@ilqpa.com">chris@ilqpa.com</a> 786-529-0090

David Herring's e company representatives prepared expert reports for use by Plaintiff's counsel. Expert has not yet been deposed in the matter. Litigation is ongoing.

• Saltwater Sol Hospitality LLC v. Westchester Surplus Lines Insurance Company (2019 to present)

Retained as expert for Plaintiff's counsel for Federal court litigation in Northern District of Florida. Case involves a covered commercial insurance claim from Hurricane Michael.

Chris Aguirre, Esq.
Insurance Litigation Group, P.A.
1500 NE 162nd Street
North Miami, FL 33162
<a href="mailto:chris@ilapa.com">chris@ilapa.com</a>
786.529.0090



David Herring's company representatives prepared expert reports for use by Plaintiff's counsel. Expert has not yet been deposed in the matter. Litigation is ongoing.

• Jesus and Maria Valdes v. Safepoint Insurance Company (2019 to present)

Retained as expert for Plaintiff's counsel for state court litigation in Florida. Case involves a covered insurance claim from Hurricane Irma. Litigation is ongoing.

Mario Molina, Esq.
MAS Law Firm / Property Litigation Group
9500 S Dadeland Blvd #701
Miami, FL 33156
mm@maslawyersfl.com
305.506.4746

David Herring's company representatives prepared expert reports for use by Plaintiff's counsel. Expert was deposed in the matter on April 8, 2021. Litigation is ongoing.

Longino Ramirez v. Citizens Property Insurance Company

Retained as expert for Plaintiff's counsel for state court litigation in Florida. Case involves a covered insurance claim from Hurricane Irma.

Mario Molina, Esq.
MAS Law Firm / Property Litigation Group
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Miami, FL 33156
mm@maslawyersfl.com
305.506.4746

David Herring's company representatives prepared expert reports for use by Plaintiff's counsel. Expert was deposed in the matter on November 8, 2020. Case was settled.

Venetian Terrace Condominium Association v. America Coastal Insurance Company

Retained as expert for Plaintiff's counsel for state court litigation in Florida. Case involves a covered insurance claim from Hurricane Irma.

Brett Schlacter, Esq. Schlacter Law 1108 Kane Concourse, Suite 305 Bay Harbor Islands, FL 33154 bls@sclaterlaw.com 305.999.1111

David Herring's corporate representatives inspected the property and prepared expert reports for use by Plaintiff's counsel. Litigation is ongoing. Expert depositions have not been taken yet.

• Pat Borrico v. Heritage Property and Casualty Company



Retained as expert for Plaintiff's counsel for state court litigation in Florida. Case involves a covered insurance claim from Hurricane Irma.

Javier Delgado, Esq. Merlin Law Group, P.A. 222 Lakeview Ave, Suite 1250 West Palm Beach, FL 33401 jdelgado@merlinlawgroup.com 561.855.2120

David Herring's corporate representatives inspected the property and prepared expert reports for use by Plaintiff's counsel. Litigation is ongoing. Expert depositions have not been taken yet.

Merlin Law / Virgin Islands v. WAPA

Retained as expert for Plaintiff's counsel for litigation. Case involves a covered insurance claim from Hurricane Maria.

Javier Delgado, Esq. Merlin Law Group, P.A. 222 Lakeview Ave, Suite 1250 West Palm Beach, FL 33401 jdelgado@merlinlawgroup.com 561.855.2120

David Herring inspected the property and prepared expert reports for use by Plaintiff's counsel. Litigation is ongoing. Expert depositions have not been taken yet.

Schneider, Jonathan vs. Heritage Property and Casualty Insurance Company

Retained as expert for Plaintiff's counsel for state court litigation in Florida. Case involves a covered insurance claim from Hurricane Irma.

Chris Aguirre, Esq. Insurance Litigation Group, P.A. 1500 NE 162nd Street North Miami, FL 33162 chris@ilgpa.com 786.529.0090

David Herring inspected the property and prepared expert reports for use by Plaintiff's counsel. Case is settled.

• Gary Drain v. DR Horton Homes 20ca406

Retained as expert for Plaintiff's counsel for state court litigation in Florida. Case involves a covered insurance claim from Hurricane Irma.



Matt Landau
The Landau Law Group, P.A.
1200 North Federal Highway, Ste. 200
Boca Raton, FL 33432
joan@thelandaulawgroup.com
www.Thelandaulawgroup.com
Office Phone: (954) 964-0900
Mobile Phone: (561) 246-9890

David Herring inspected the property and prepared expert reports for use by Plaintiff's counsel. Litigation is ongoing. Expert depositions have not been taken yet.

Jammie McCullers & Arthur Tetrault v. Family Security Insurance Company

Retained as expert for Plaintiff's counsel for state court litigation in Florida. Case involves a covered insurance claim from Hurricane Michael.

Chris Aguirre, Esq.
Insurance Litigation Group, P.A.
1500 NE 162nd Street
North Miami, FL 33162
<a href="mailto:chris@ilgpa.com">chris@ilgpa.com</a>
786.529.0090

David Herring inspected the property and prepared expert reports for use by Plaintiff's counsel. Litigation is ongoing. Expert depositions have not been taken yet.

Katherine Stange

Retained as pre-suit loss consultant regarding a Hurricane Michael claim. It is anticipated David Herring will serve as expert witness once litigation has commenced and prepare pre-suit damage estimate for use in settlement.

Stephen G. Mortimer Rahdart & Mortimer, PLLC 535 Central Avenue St. Petersburg, FL 33701 smortimer@rahdertlaw.com 727-823-4191

Patrick Rezende v. Avatar Property & Casualty Insurance Company

Retained as expert for Plaintiff's counsel for state court litigation in Florida. Case involves a covered insurance claim from Hurricane Michael.

Paul M. Núñez, Esq. Rodriguez Tramont & Núñez, P.A. 255 Alhambra Circle, Suite 1150 Coral Gables, Florida 33134

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David Herring's corporate representative inspected the property and prepared expert reports for use by Plaintiff's counsel. Litigation is ongoing. Expert depositions have not been taken yet.

Estates of Fort Lauderdale Property Owners Association v. Indian Harbor Insurance Company

Retained as expert for Plaintiff's counsel for federal court litigation in Florida. Case involves a covered insurance claim from Hurricane Irma. The case was settled.

Mario Molina, Esq.
MAS Law Firm / Property Litigation Group
9500 S Dadeland Blvd #701
Miami, FL 33156
mm@maslawyersfl.com
305.506.4746

David Herring's corporate representative prepared expert reports for use by Plaintiff's counsel. Expert was deposed in the matter on September 23, 2021. Case was settled.

• William and Mary Paulchek v. Tudor Insurance Company

Retained as expert for Plaintiff's counsel for federal court litigation in Florida. Case involves a covered insurance claim from Hurricane Sally. Litigation is ongoing.

Yisreol Silverman, Esq. Insurance Litigation Group, P.A. 1500 NE 162 Street Miami, FL 33162 yisreol@ilgpa.com 786.529.0090

David Herring's corporate representative prepared expert reports for use by Plaintiff's counsel. Expert was deposed in the matter on February 7, 2022. Litigation is ongoing.

• Ronny Kent v. Security First Insurance Company

Retained as expert for Plaintiff's counsel for state court litigation in Florida. Case involves a covered insurance claim from Hurricane Michael. Litigation is ongoing.

H. Lawrence Perry, Esq. Perry & Young, P.A. 200 Harrison Ave Panama City, FL 32401 Iperry@perry-young.com 850.215.7777

David Herring's corporate representative prepared expert reports for use by Plaintiff's counsel. Expert was deposed in the matter on February 16, 2022. Litigation is ongoing.



• Ronald Jurgonski v. State Farm Florida Insurance Company

Retained as expert for Plaintiff's counsel for state court litigation in Florida. Case involves a covered insurance claim. Litigation is ongoing.

Milton B. Grey, Esq. Insurance Litigation Group, P.A. 1500 NE 162 Street Miami, FL 33162 milton@ilgpa.com 786,529,0090

David Herring inspected the property and prepared expert reports for use by Plaintiff's counsel. David Herring was deposed as Plaintiff's expert. Case is settled.

Chinese Drywall Litigation (active)

Gharib et al v. Knauf Gips KG et al, 2:20-cv-03264-EEF-MBN, in the Eastern District of New Orleans, Louisiana. Retained as expert for two Chinese drywall claims in Louisiana.

Crull, Castaing and Lilly 601 Poydras Street, Suite 2323, New Orleans, LA 70130 pcastaing@cclhlaw.com 504.442.1699

Expert reports are in the process of being prepared for use by Plaintiff's counsel. Litigation is ongoing. Expert depositions have not been taken yet.

First Party Insurance Claims involving Cast Iron Pipe Leaks Resulting Damages Litigation (active)
Jeffrey D. DeCarlo
Attorney at Law
The Nation Law Firm
570 Crown Oak Centre Drive
Longwood, FL 32750
Phone: (407) 330, 1104

Phone: (407) 339-1104 Fax: (321) 388-9877 www.nationlaw.com

David Herring is a damages expert for Plaintiff's counsel in a number of first party property insurance claims involving cast iron pipe leak claims in state and federal court in Florida and throughout the United States. David Herring corporate representative(s) has/have prepared reports for use by Plaintiff's counsel that David Herring has reviewed. He has not yest testified in any of these cases at deposition or at trial but expects to do so in the future.

#### <u>Licenses</u>

- Florida Certified Adjuster
- Certified Appraiser & Umpire Insurance Fellow for Appraisal & Umpire
- WI Dwelling / General Contractor #DC-022200139
- PA Home Restoration Contractor# PA169051

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david@risedoc.com



OSHA 1926 Construction Silica Safety Certification

#### **Notable Publications and Speaking Engagements:**

- "What Makes a Great Public Adjuster" posted on Merlin Law Blog and Georgia Public Adjuster's Association (2016).
- https://www.propertyinsurancecoveragelaw.com/2015/04/articles/insurance/characteristics-of-the-best-public-adjusters/
- "Estimation and Expert Support of Large Loss Claims" Ongoing speaking series for DRI Inc. Large Loss classes (2017-2018).
- Restoration 2.0 Founder Founding member of a large organization of industry professionals who focus on servicing the insured through ethical and strict guidelines.
- Matterport TM Three Dimensional Imagery Press Release and Interview and link to David
  Herring/WriteLoss, Inc. as market maker for Matterport TM technology in the insurance claims industry
  as featured in Business Insider (2018) <a href="https://www.prnewswire.com/news-releases/matterports-innovative-3d-reality-capture-technology-helps-protect-valuable-property-investments-300571176.html">https://www.prnewswire.com/news-releases/matterports-innovative-3d-reality-capture-technology-helps-protect-valuable-property-investments-300571176.html</a>
- "Labor Burden" White Paper Hurricane Michael <a href="https://www.dropbox.com/s/ke6lsspewpb2hzd/Hurricane%20Michael%20white%20Paper%20copy.pdf?dl=0">https://www.dropbox.com/s/ke6lsspewpb2hzd/Hurricane%20Michael%20white%20Paper%20copy.pdf?dl=0</a> (2019)

REFERENCES - See Attorney references by case, Additional references will be provided upon request.

## 2 - ESTIMATE AND PHOTOS

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## **USA DAMAGE RESPONSE TEAM**

1450 Madruga Ave. Suite 407 Coral Gables, FL www.usadamageresponse.com

Insured: William Griffin Home: (731) 420-1402

Property: 128 Poplar St

Gadsden, TN 38337

Claim Rep.: USA Damage Response Team Business: (305) 662-6092

E-mail: estimates@usadamageresponse.

com

Estimator: WriteLoss, Inc. Business: (850) 460-0238

E-mail: info@writeloss.com

Claim Number: Type of Loss: Residential

Date of Loss:

Date Received:

Date Inspected: 5/5/2020 12:00 AM Date Entered: 10/21/2020 5:33 AM

Price List: TNJA8X\_OCT20

Restoration/Service/Remodel

Estimate: GRIFFIN\_USA\_DAMAGE1

## • Estimate Information •

Estimate Grand Total: \$102 681.76

Link to 3D walk through: Main House

http://tiny.cc/mbsioz

Link to 3D walk through: Workshop

http://tiny.cc/sdsioz

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## USA DAMAGE RESPONSE TEAM

1450 Madruga Ave. Suite 407 Coral Gables, FL www.usadamageresponse.com

## GRIFFIN\_USA\_DAMAGE1

## **Plumbing Estimate**

DESCRIPTION	QUANTITY UN	NIT PRICE	TAX	O&P	RCV	DEPREC.	ACV
1. Plumbing Estimate*	<u>1.00</u> <u>EA</u>	9,952.00	0.00	0.00	9,952.00	(0.00)	9,952.00
Totals: Plumbing Estimate			0.00	0.00	9,952.00	0.00	9,952.00

#### Roof

DESCRIPTION	QUANTITY UN	IT PRICE	TAX	O&P	RCV	DEPREC.	ACV
2. Roofer - per hour	4.00 HR	71.41	0.00	57.12	342.76	(0.00)	342.76
3. R&R Metal roofing - corrugated - 26 gauge	64.00 SF	3.78	7.36	49.86	299.14	(44.99)	254.15
4. Roofing felt - 15 lb.	1.00 SQ	18.81	0.54	3.86	23.21	(14.52)	8.69
5. R&R Flashing - pipe jack - lead	1.00 EA	60.07	3.73	12.76	76.56	(25.12)	51.44
6. Flashing - pipe jack - lead	1.00 EA	54.87	3.73	11.72	70.32	(25.12)	45.20
7. Prime & paint roof jack	2.00 EA	32.86	1.40	13.42	80.54	(4.47)	76.07
Totals: Roof			16.76	148.74	892.53	114.22	778.31

## Exterior

### **Rear Porch**

DESCRIPTION	QUANTITY U	JNIT PRICE	TAX	O&P	RCV	DEPREC.	ACV
8. R&R Concrete slab on grade - 8" - finished in place	1,086.58 SF	9.55	377.15	2,150.80	12,904.79	(670.11)	12,234.68
9. General Laborer - per hour	32.00 HR	33.06	0.00	211.58	1,269.50	(0.00)	1,269.50
Grading dirt and pouring new concrete.							
10. Backhoe loader and operator	12.00 HR	83.70	0.00	200.88	1,205.28	(0.00)	1,205.28
Totals: Rear Porch			377.15	2,563.26	15,379.57	670.11	14,709.46

#### **Rear Elevation**

DESCRIPTION	QUANTITY	UNIT PRICE	TAX	O&P	RCV	DEPREC.	ACV
11. R&R Brick veneer	504.00 SF	14.92	190.66	1,542.08	9,252.42	(457.91)	8,794.51
12. Vinyl window - Detach & reset	4.00 EA	82.75	2.71	66.74	400.45	(0.00)	400.45
13. R&R Wrap wood window frame & trim with aluminum sheet	4.00 EA	149.15	15.56	122.44	734.60	(102.89)	631.71

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## USA DAMAGE RESPONSE TEAM

1450 Madruga Ave. Suite 407 Coral Gables, FL www.usadamageresponse.com

#### **CONTINUED - Rear Elevation**

DESCRIPTION	QUANTITY	UNIT PRICE	TAX	O&P	RCV	DEPREC.	ACV
14. R&R Stud wall - 2" x 4" - 16" oc	240.00 SF	2.68	35.33	135.70	814.23	(21.34)	792.89
15. Metal roofing - Detach & reset	240.00 SF	3.00	3.28	144.66	867.94	(0.00)	867.94
16. Carpenter - General Framer - per hour	16.00 HR	49.84	0.00	159.48	956.92	(0.00)	956.92
Totals: Rear Elevation			247.54	2,171.10	13,026.56	582.14	12,444.42

## **Left Elevation**

DESCRIPTION	QUANTITY UN	NIT PRICE	TAX	O&P	RCV	DEPREC.	ACV
17. R&R Brick veneer	246.00 SF	14.92	93.06	752.68	4,516.06	(223.50)	4,292.56
18. Shutters - Detach & reset	2.00 EA	20.00	0.00	8.00	48.00	(0.00)	48.00
19. Vinyl window - Detach & reset	2.00 EA	82.75	1.36	33.38	200.24	(0.00)	200.24
20. R&R Wrap wood window frame & trim with aluminum sheet	2.00 EA	149.15	7.78	61.22	367.30	(51.45)	315.85
Totals: Left Elevation			102.20	855.28	5,131.60	274.95	4,856.65

#### **Front Elevation**

DESCRIPTION	QUANTITY	UNIT PRICE	TAX	O&P	RCV	DEPREC.	ACV
21. R&R Brick veneer	389.00 SF	14.92	147.16	1,190.22	7,141.26	(353.43)	6,787.83
22. Shutters - Detach & reset	3.00 EA	20.00	0.00	12.00	72.00	(0.00)	72.00
23. Vinyl window - Detach & reset	5.00 EA	82.75	3.39	83.44	500.58	(0.00)	500.58
24. R&R Wrap wood window frame & trim with aluminum sheet	5.00 EA	149.15	19.45	153.06	918.26	(128.62)	789.64
25. Gutter / downspout - Detach & reset	$20.00\mathrm{LF}$	2.50	0.00	10.00	60.00	(0.00)	60.00
26. Mason - Brick / Stone - per hour	8.00 HR	65.00	0.00	104.00	624.00	(0.00)	624.00
27. Carpenter - General Framer - per hour	16.00 HR	49.84	0.00	159.48	956.92	(0.00)	956.92
D&R Wood Ramp							
28. Carpenter - General Framer - per hour	6.00 HR	49.84	0.00	59.80	358.84	(0.00)	358.84
D&R Columns							
29. R&R 1" x 6" lumber (.5 BF per LF)	32.00 LF	2.79	2.78	18.42	110.48	(2.32)	108.16
30. R&R Fascia - metal - 6"	32.00 LF	3.98	4.68	26.42	158.46	(24.88)	133.58
Totals: Front Elevation			177.46	1,816.84	10,900.80	509.25	10,391.55



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## **Right Elevation**

DESCRIPTION	QUANTITY	UNIT PRICE	TAX	O&P	RCV	DEPREC.	ACV
31. R&R Brick veneer	297.00 SF	14.92	112.36	908.74	5,452.34	(269.84)	5,182.50
32. Shutters - Detach & reset	1.00 EA	20.00	0.00	4.00	24.00	(0.00)	24.00
33. Vinyl window - Detach & reset	1.00 EA	82.75	0.68	16.70	100.13	(0.00)	100.13
34. R&R Wrap wood window frame & trim with aluminum sheet	1.00 EA	149.15	3.89	30.60	183.64	(25.73)	157.91
35. General Laborer - per hour	1.00 HR	33.06	0.00	6.62	39.68	(0.00)	39.68
D&R Window A/C unit from wall.							
Totals: Right Elevation			116.93	966.66	5,799.79	295.57	5,504.22
Total: Exterior			1.021.28	8.373.14	50,238,32	2,332.02	47,906,30

# SKETCH1 Main Level

Bathroom Height: 8'

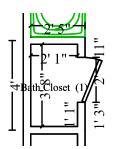
307.17 SF Walls 381.00 SF Walls & Ceiling 8.20 SY Flooring

38.40 LF Floor Perimeter

73.83 SF Ceiling

73.83 SF Floor

38.40 LF Ceil. Perimeter



Subroom: Bath Closet (1) Height: 8'

92.00 SF Walls 99.64 SF Walls & Ceiling 0.85 SY Flooring

11.50 LF Ceil. Perimeter

7.64 SF Ceiling7.64 SF Floor

S SY Flooring 11.50 LF Floor Perimeter

DESCRIPTION	QUANTITY	UNIT PRICE	TAX	O&P	RCV	DEPREC.	ACV
Mitigation							
36. Clean floor - Heavy	81.47 SF	0.45	0.08	7.36	44.10	(0.00)	44.10
37. Clean stud wall - Heavy	32.00 SF	0.76	0.06	4.88	29.26	(0.00)	29.26
38. Apply plant-based anti-microbial agent to more than the floor	113.47 SF	0.21	0.55	4.88	29.26	(0.00)	29.26
Walls							
39. R&R Batt insulation - 4" - R13 - paper / foil faced	32.00 SF	0.88	1.47	5.94	35.57	(0.80)	34.77
40. R&R 1/2" drywall - hung, taped, ready for texture	32.00 SF	2.13	1.59	13.94	83.69	(1.99)	81.70



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#### **CONTINUED - Bathroom**

DESCRIPTION	QUANTITY	UNIT PRICE	TAX	O&P	RCV	DEPREC.	ACV
41. Scrape part of the walls & prep for paint	147.92 SF	0.60	0.14	17.78	106.67	(5.93)	100.74
42. Texture drywall - light hand texture	179.92 SF	0.54	0.88	19.62	117.66	(3.27)	114.39
43. Seal part of the walls w/latex based stain blocker - one coat	179.92 SF	0.56	1.23	20.40	122.39	(6.80)	115.59
44. Paint part of the walls - two coats	179.92 SF	0.88	3.51	32.36	194.20	(10.79)	183.41
45. R&R Ceramic/porcelain tile	219.25 SF	10.52	99.62	481.22	2,887.35	(70.48)	2,816.87
46. R&R 1/2" Cement board	219.25 SF	3.54	27.79	160.78	964.72	(22.27)	942.45
47. R&R Ceramic tile - bullnose - 3/4" x 6"	53.90 LF	7.54	13.09	83.90	503.39	(11.18)	492.21
48. R&R Light fixture - wall sconce	1.00 EA	90.50	5.49	19.20	115.19	(13.47)	101.72
49. R&R Bathroom mirror - w/metal frame - surface mtd Std grd	e 12.67 SF	17.43	12.30	46.64	279.78	(54.05)	225.73
50. R&R Window blind - PVC - 1" - up to 7 SF	1.00 EA	48.98	1.33	10.04	60.35	(25.72)	34.63
51. R&R Toilet paper holder	1.00 EA	25.39	1.21	5.32	31.92	(2.29)	29.63
52. R&R Switch	1.00 EA	16.04	0.19	3.24	19.47	(1.50)	17.97
53. R&R Outlet	1.00 EA	15.67	0.16	3.16	18.99	(1.45)	17.54
54. R&R Towel bar	1.00 EA	29.04	1.47	6.10	36.61	(2.59)	34.02
55. R&R Bathroom ventilation fan	1.00 EA	92.77	4.36	19.44	116.57	(25.24)	91.33
56. R&R Bath accessory	1.00 EA	28.12	1.47	5.92	35.51	(2.59)	32.92
57. R&R Shower curtain rod	1.00 EA	30.34	1.60	6.38	38.32	(2.73)	35.59
58. R&R Crown molding - 2 1/4"	49.90 LF	3.04	5.06	31.38	188.14	(4.40)	183.74
59. Stain & finish crown molding	49.90 LF	1.55	0.88	15.66	93.89	(5.22)	88.67
60. Mask and prep for paint - plastic, paper, tape (per LF)	49.90 LF	1.30	1.26	13.24	79.37	(4.40)	74.97
Cabinetry							
61. R&R Vanity	5.00 LF	188.52	77.51	204.04	1,224.15	(99.24)	1,124.91
62. R&R Countertop - flat laid plastic laminate	5.00 LF	37.48	12.68	40.02	240.10	(61.36)	178.74
63. R&R Cabinet hinge - surface mount	4.00 EA	5.60	0.86	4.66	27.92	(4.90)	23.02
64. Cabinet knob or pull	2.00 EA	6.59	0.69	2.78	16.65	(3.47)	13.18
Plumbing							
65. Material Only Sink - single	1.00 EA	157.04	15.31	34.46	206.81	(17.23)	189.58
66. Material Only Sink strainer and drain assembly	1.00 EA		1.75	3.96	23.70	(0.99)	22.71
67. Material Only Sink faucet - Bathroom	1.00 EA	132.97	12.96	29.20	175.13	(36.48)	138.65
68. Material Only Plumbing fixture supply line	3.00 EA		1.75	3.94	23.63	(4.93)	18.70
69. Material Only Angle stop valve	3.00 EA		2.10	4.74	28.41	(1.19)	27.22
70. Material Only P-trap assembly - ABS (plastic)	1.00 EA	6.04	0.59	1.32	7.95	(1.33)	6.62



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#### **CONTINUED - Bathroom**

DESCRIPTION	QUANTITY	UNIT PRICE	TAX	O&P	RCV	DEPREC.	ACV
71. Material Only Toilet	1.00 EA	266.29	25.96	58.46	350.71	(9.75)	340.96
72. Material Only Toilet seat	1.00 EA	31.47	3.07	6.92	41.46	(19.19)	22.27
73. Material Only Toilet flange	1.00 EA	70.53	6.88	15.48	92.89	(15.49)	77.40
74. Material Only Bathtub	1.00 EA	403.20	39.31	88.50	531.01	(44.25)	486.76
75. Material Only Tub/shower faucet	1.00 EA	140.00	13.65	30.74	184.39	(38.41)	145.98
76. Material Only Shower head only	1.00 EA	30.50	2.97	6.70	40.17	(8.37)	31.80
Floor							
77. Remove Vinyl tile	81.47 SF	0.84	0.00	13.68	82.11	(0.00)	82.11
78. Vinyl tile	93.69 SF	3.07	19.82	61.48	368.93	(30.74)	338.19
15% Waste							
79. Floor preparation for resilient flooring	81.47 SF	0.42	0.79	7.00	42.01	(3.50)	38.51
80. Embossing leveler for vinyl flooring	81.47 SF	0.77	2.62	13.06	78.41	(6.53)	71.88
Doors & Windows							
81. R&R Shower door	1.00 EA	355.04	27.28	76.48	458.80	(44.25)	414.55
82. Interior door - Detach & reset - slab only	2.00 EA	13.24	0.00	5.30	31.78	(0.00)	31.78
83. Stain & finish door slab only (per side)	4.00 EA	53.76	3.08	43.62	261.74	(14.55)	247.19
84. R&R Door opening (jamb & casing) - 32"to36"wide - paint grade	2.00 EA	128.08	18.09	54.86	329.11	(8.83)	320.28
85. Stain & finish door/window trim & jamb (per side)	4.00 EA	37.65	2.17	30.56	183.33	(10.18)	173.15
86. R&R Window trim set (casing & stop)	10.67 LF	4.39	2.35	9.86	59.05	(1.51)	57.54
87. Stain & finish trim	10.67 LF	1.45	0.20	3.14	18.81	(1.04)	17.77
Misc.							
88. Content Manipulation charge - per hour	2.00 HR	33.06	0.00	13.22	79.34	(0.00)	79.34
89. Protect contents - Cover with plastic	81.47 SF	0.16	0.48	2.70	16.22	(0.00)	16.22
90. Final cleaning - construction - Residential	81.47 SF	0.18	0.00	2.94	17.60	(0.00)	17.60
Totals: Bathroom			481.71	1,912.60	11,474.69	766.87	10,707.82

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## **USA DAMAGE RESPONSE TEAM**

1450 Madruga Ave. Suite 407 Coral Gables, FL www.usadamageresponse.com



Living Room Height: 8'

809.33 SF Walls 1174.58 SF Walls & Ceiling 40.58 SY Flooring 105.33 LF Ceil. Perimeter

365.25 SF Floor 100.33 LF Floor Perimeter

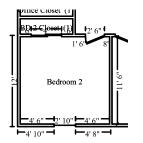
365.25 SF Ceiling

Missing Wall - Goes to Floor

5' X 6' 8"

## **Opens into DINING ROOM**

DESCRIPTION	QUANTITY	UNIT PRICE	TAX	O&P	RCV	DEPREC.	ACV
Walls							
91. R&R Quarter round - 3/4" - stain grade	100.33 LF	1.56	8.90	33.08	198.50	(5.12)	193.38
92. Stain & finish base shoe or quarter round	100.33 LF	1.16	1.76	23.64	141.78	(7.88)	133.90
93. Stain & finish baseboard	100.33 LF	1.44	1.76	29.26	175.50	(9.75)	165.75
Floor							
94. Sand, stain, and finish wood floor	365.25 SF	3.52	32.05	263.56	1,581.29	(658.87)	922.42
95. Add for dustless floor sanding	365.25 SF	1.00	0.00	73.06	438.31	(182.63)	255.68
Totals: Living Room			44.47	422.60	2,535,38	864.25	1.671.13

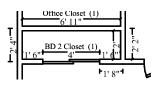


Bedroom 2 Height: 8'

372.00 SF Walls 507.13 SF Walls & Ceiling 15.01 SY Flooring 46.50 LF Ceil. Perimeter

135.13 SF Floor46.50 LF Floor Perimeter

135.13 SF Ceiling



Subroom: BD 2 Closet (1) Height: 8'

142.67 SF Walls156.50 SF Walls & Ceiling1.54 SY Flooring17.83 LF Ceil. Perimeter

13.83 SF Floor17.83 LF Floor Perimeter

13.83 SF Ceiling

DESCRIPTION	QUANTITY UN	IT PRICE	TAX	O&P	RCV	DEPREC.	ACV
Walls							
96. R&R Quarter round - 3/4" - stain grade	64.33 LF	1.56	5.71	21.20	127.27	(3.28)	123.99
97. Stain & finish base shoe or quarter round	64.33 LF	1.16	1.13	15.14	90.89	(5.05)	85.84
98. Stain & finish baseboard	64.33 LF	1.44	1.13	18.74	112.51	(6.26)	106.25
Floor							

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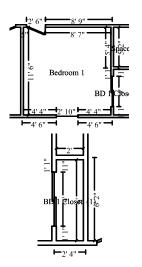


## **USA DAMAGE RESPONSE TEAM**

1450 Madruga Ave. Suite 407 Coral Gables, FL www.usadamageresponse.com

#### **CONTINUED - Bedroom 2**

DESCRIPTION	QUANTITY UN	IT PRICE	TAX	O&P	RCV	DEPREC.	ACV
99. Sand, stain, and finish wood floor	148.96 SF	3.52	13.07	107.48	644.89	(268.71)	376.18
100. Add for dustless floor sanding	148.96 SF	1.00	0.00	29.80	178.76	(74.48)	104.28
Totals: Bedroom 2			21.04	192.36	1,154.32	357.78	796.54



Bedroom 1			Height: 8
	368.00 SF Walls	132.25 SF Ceiling	

500.25 SF Walls & Ceiling
132.25 SF Ceiling
132.25 SF Floor
14.69 SY Flooring
46.00 LF Floor Perimeter
46.00 LF Ceil. Perimeter

Subroom: BD 1 Closet (1) Height: 8'

128.00 SF Walls12.00 SF Ceiling140.00 SF Walls & Ceiling12.00 SF Floor1.33 SY Flooring16.00 LF Floor Perimeter

DESCRIPTION	QUANTITY U	UNIT PRICE	TAX	O&P	RCV	DEPREC.	ACV
Walls							
101. R&R Quarter round - 3/4" - stain grade	62.00 LF	1.56	5.50	20.44	122.66	(3.16)	119.50
102. Stain & finish base shoe or quarter round	62.00 LF	1.16	1.09	14.60	87.61	(4.86)	82.75
103. Stain & finish baseboard	62.00 LF	1.44	1.09	18.08	108.45	(6.02)	102.43
Floor							
104. Sand, stain, and finish wood floor	144.25 SF	3.52	12.66	104.10	624.52	(260.21)	364.31
105. Add for dustless floor sanding	144.25 SF	1.00	0.00	28.86	173.11	(72.13)	100.98
Totals: Bedroom 1			20.34	186.08	1,116.35	346.38	769.97

16.00 LF Ceil. Perimeter

## 



## USA DAMAGE RESPONSE TEAM

1450 Madruga Ave. Suite 407 Coral Gables, FL www.usadamageresponse.com



Office Height: 8' 369.33 SF Walls 133.17 SF Ceiling

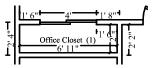
502.50 SF Walls & Ceiling 14.80 SY Flooring 46.17 LF Ceil. Perimeter

46.17 LF Floor Perimeter

133.17 SF Floor

**Subroom: Office Closet (1)** 

Height: 8'



142.67 SF Walls 13.83 SF Ceiling 156.50 SF Walls & Ceiling 13.83 SF Floor 1.54 SY Flooring

17.83 LF Ceil. Perimeter

17.83 LF Floor Perimeter

DESCRIPTION	QUANTITY UN	NIT PRICE	TAX	O&P	RCV	DEPREC.	ACV
Walls							
106. R&R Quarter round - 3/4" - stain grade	64.00 LF	1.56	5.68	21.12	126.64	(3.26)	123.38
107. Stain & finish base shoe or quarter round	64.00 LF	1.16	1.12	15.06	90.42	(5.02)	85.40
108. Stain & finish baseboard	64.00 LF	1.44	1.12	18.66	111.94	(6.21)	105.73
Floor							
109. Sand, stain, and finish wood floor	147.00 SF	3.52	12.90	106.06	636.40	(265.17)	371.23
110. Add for dustless floor sanding	147.00 SF	1.00	0.00	29.40	176.40	(73.50)	102.90
Totals: Office			20.82	190.30	1,141.80	353.16	788.64

Total: Main Level	588.38	2,903.94	17,422.54	2,688.44	14,734.10
Total: SKETCH1	588.38	2,903.94	17,422.54	2,688.44	14,734.10

#### **General Conditions**

DESCRIPTION	QUANTITY U	INIT PRICE	TAX	O&P	RCV	DEPREC.	ACV
111. General clean - up	4.00 HR	31.10	0.00	24.88	149.28	(0.00)	149.28
112. Residential Supervision / Project Management - per hour	65.00 HR	57.90	0.00	752.70	4,516.20	(0.00)	4,516.20
113. Dumpster load - Approx. 20 yards, 4 tons of debris	3.00 EA	473.29	0.00	283.98	1,703.85	(0.00)	1,703.85
114. Taxes, insurance, permits & fees (Bid Item)	1.00 EA	1,020.00	0.00	0.00	1,020.00	(0.00)	1,020.00
115. Neg. air fan/Air scrubLarge (per 24 hr period)-No monit.	7.00 DA	107.20	0.00	150.08	900.48	(0.00)	900.48



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#### **CONTINUED - General Conditions**

DESCRIPTION	QUANTITY	UNIT PRICE	TAX	O&P	RCV	DEPREC.	ACV
116. Add for HEPA filter (for negative air exhaust fan)	1.00 EA	183.67	17.06	40.16	240.89	(0.00)	240.89
117. Air handler - with A-coil - Detach & reset	1.00 EA	810.10	0.00	162.02	972.12	(0.00)	972.12
118. Central air cond. system - refrigerant evacuation	1.00 EA	127.58	0.00	25.52	153.10	(0.00)	153.10
119. Clean evaporator coil	1.00 EA	42.99	0.02	8.60	51.61	(0.00)	51.61
120. Clean air handler - Large	1.00 EA	43.49	0.07	8.72	52.28	(0.00)	52.28
121. Clean ductwork - Interior (PER REGISTER)	9.00 EA	28.21	0.07	50.80	304.76	(0.00)	304.76
122. R&R Sheathing - plywood - 1/2" CDX	128.00 SF	2.18	14.98	58.82	352.84	(0.00)	352.84
Add Plywood for Dumpster to set on.							
123. Temporary toilet (per month)	2.00 MC	109.00	0.00	43.60	261.60	(0.00)	261.60
124. Mason - Brick / Stone - per hour	80.00 HR	65.00	0.00	1,040.00	6,240.00	(0.00)	6,240.00
125. Residential Supervision / Project Management - per hour	49.00 HR	57.90	0.00	567.42	3,404.52	(0.00)	3,404.52
Safety							
126. General Laborer - per hour	8.00 HR	33.06	0.00	52.90	317.38	(0.00)	317.38
127. Exterior faucet / hose bibb - Detach & reset	2.00 EA	49.11	0.00	19.64	117.86	(0.00)	117.86
128. Electrician - per hour	20.00 HR	80.85	0.00	323.40	1,940.40	(0.00)	1,940.40
129. Job-site cargo/storage container - 20' long - per month	1.00 MC	87.83	8.56	19.28	115.67	(0.00)	115.67
<b>Totals: General Conditions</b>			40.76	3,632.52	22,814.84	0.00	22,814.84

## **Labor Minimums Applied**

DESCRIPTION	QUANTITY U	NIT PRICE	TAX	O&P	RCV	DEPREC.	ACV
130. Water extract/remediation labor minimum*	1.00 EA	123.22	0.00	24.64	147.86	(0.00)	147.86
131. Drywall labor minimum*	1.00 EA	310.45	0.00	62.10	372.55	(0.00)	372.55
132. Finish hardware labor minimum*	1.00 EA	93.74	0.00	18.74	112.48	(0.00)	112.48
133. Plumbing labor minimum*	1.00 EA	177.06	0.00	35.42	212.48	(0.00)	212.48
134. Floor cleaning labor minimum	1.00 EA	74.06	0.00	14.82	88.88	(0.00)	88.88
135. Gutter labor minimum	1.00 EA	118.91	0.00	23.78	142.69	(0.00)	142.69
136. Insulation labor minimum	1.00 EA	114.98	0.00	23.00	137.98	(0.00)	137.98
137. Toilet & bath accessory labor minimum	1.00 EA	14.50	0.00	2.90	17.40	(0.00)	17.40
138. Window treatment repair	1.00 EA	73.76	0.00	14.76	88.52	(0.00)	88.52



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## **CONTINUED - Labor Minimums Applied**

DESCRIPTION	QUANTITY U	UNIT PRICE	TAX	O&P	RCV	DEPREC.	ACV
139. Mirror/shower door labor minimum	1.00 EA	33.91	0.00	6.78	40.69	(0.00)	40.69
Totals: Labor Minimums Applied			0.00	226.94	1,361.53	0.00	1,361.53
Line Item Totals: GRIFFIN_USA_DAM	MAGE1	•	1,667.18	15,285.28	102,681.76	5,134.68	97,547.08

## **Grand Total Areas:**

2,980.17	SF Walls SF Floor SF Long Wall	331.13	SF Ceiling SY Flooring SF Short Wall	1,104.00	SF Walls and Ceiling LF Floor Perimeter LF Ceil. Perimeter
,	Floor Area Exterior Wall Area	,	Total Area Exterior Perimeter of Walls	8,935.22	Interior Wall Area
	Surface Area Total Ridge Length		Number of Squares Total Hip Length	0.00	Total Perimeter Length

Coverage	Item Total	%	ACV Total	%
Dwelling	102,364.38	99.69%	97,229.70	99.67%
Other Structures	317.38	0.31%	317.38	0.33%
Contents	0.00	0.00%	0.00	0.00%
Total	102,681.76	100.00%	97,547.08	100.00%

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## USA DAMAGE RESPONSE TEAM

1450 Madruga Ave. Suite 407 Coral Gables, FL www.usadamageresponse.com

## **Summary for Dwelling**

•	
Line Item Total	85,464.82
Material Sales Tax	1,658.62
Storage Rental Tax	8.56
Subtotal	87,132.00
Overhead	7,616.19
Profit	7,616.19
Replacement Cost Value	\$102,364.38
Less Depreciation	(5,134.68)
Actual Cash Value	\$97,229.70
Net Claim	\$97,229.70
Total Recoverable Depreciation	5,134.68
Net Claim if Depreciation is Recovered	\$102,364.38

WriteLoss, Inc.

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## USA DAMAGE RESPONSE TEAM

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## **Summary for Other Structures**

	J	
Line Item Total		264.48
Overhead		26.45
Profit		26.45
Replacement Cost Value		\$317.38
Net Claim		\$317.38
	WriteLoss, Inc.	



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## Recap of Taxes, Overhead and Profit

Overl	nead (10%)	Profit (10%)	Material Sales Tax (9.75%)	P Ppty Material Tax (9.75%)	P Ppty Cleaning Tax (9.75%)	Storage Rental Tax (9.75%)	Food Tax (7.75%)
Line Items							
	7,642.64	7,642.64	1,658.62	0.00	0.00	8.56	0.00
Total							
	7,642.64	7,642.64	1,658.62	0.00	0.00	8.56	0.00



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## **Recap by Room**

Estimate: GRIFFIN_USA_DAMAGE1			
Plumbing Estimate		9,952.00	11.61%
Coverage: Dwelling	100.00% =	9,952.00	0.070/
Roof		727.03	0.85%
Coverage: Dwelling	100.00% =	727.03	
Area: Exterior			
Rear Porch		12,439.16	14.51%
Coverage: Dwelling	100.00% =	12,439.16	
Rear Elevation		10,607.92	12.37%
Coverage: Dwelling	100.00% =	10,607.92	
Left Elevation		4,174.12	4.87%
Coverage: Dwelling	100.00% =	4,174.12	
Front Elevation		8,906.50	10.39%
Coverage: Dwelling	100.00% =	8,906.50	<b>= =</b> 00/
Right Elevation		4,716.20	5.50%
Coverage: Dwelling	100.00% =	4,716.20	
Area Subtotal: Exterior		40,843.90	47.64%
Coverage: Dwelling	100.00% =	40,843.90	
Area: SKETCH1			
Area: Main Level			
Bathroom		9,080.38	10.59%
Coverage: Dwelling	100.00% =	9,080.38	
Living Room		2,068.31	2.41%
Coverage: Dwelling	100.00% =	2,068.31	
Bedroom 2		940.92	1.10%
Coverage: Dwelling	100.00% =	940.92	
Bedroom 1		909.93	1.06%
Coverage: Dwelling	100.00% =	909.93	
Office		930.68	1.09%
Coverage: Dwelling	100.00% =	930.68	
Area Subtotal: Main Level		13,930.22	16.25%
Coverage: Dwelling	100.00% =	13,930.22	
Area Subtotal: SKETCH1		13,930.22	16.25%
Coverage: Dwelling	100.00% =	13,930.22	
General Conditions		19,141.56	22.33%
Coverage: Dwelling	98.62% =	18,877.08	
Coverage: Other Structures	1.38% =	264.48	
GRIFFIN_USA_DAMAGE1		8/23/2022	Page: 15

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## USA DAMAGE RESPONSE TEAM

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<b>Labor Minimums Applied</b> Coverage: Dwelling	100.00% =	<b>1,134.59</b> 1,134.59	1.32%
Subtotal of Areas		85,729.30	100.00%
Coverage: Dwelling	99.69% =	85,464.82	
Coverage: Other Structures	0.31% =	264.48	
Total	<del></del>	85,729.30	100.00%



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## **Recap by Category with Depreciation**

O&P Items			RCV	Deprec.	ACV
CABINETRY			1,118.15	156.60	961.55
Coverage: Dwelling	<u>@</u>	100.00% =	1,118.15		
CLEANING			614.47		614.47
Coverage: Dwelling	<u>@</u>	100.00% =	614.47		
CONCRETE & ASPHALT			6,323.90	632.39	5,691.51
Coverage: Dwelling	<u>@</u>	100.00% =	6,323.90		
CONTENT MANIPULATION			166.99		166.99
Coverage: Dwelling	<u>@</u>	100.00% =	166.99		
GENERAL DEMOLITION			9,112.04		9,112.04
Coverage: Dwelling	<u>@</u>	100.00% =	9,112.04		
DOORS			26.48		26.48
Coverage: Dwelling	<u>@</u>	100.00% =	26.48		
DRYWALL			465.85	5.18	460.67
Coverage: Dwelling	<u>a</u>	100.00% =	465.85		
ELECTRICAL			1,641.25	2.91	1,638.34
Coverage: Dwelling	<u>a</u>	100.00% =	1,641.25		·
HEAVY EQUIPMENT			1,004.40		1,004.40
Coverage: Dwelling	<u>@</u>	100.00% =	1,004.40		•
FLOOR COVERING - VINYL			384.58	38.45	346.13
Coverage: Dwelling	(a)	100.00% =	384.58		
FLOOR COVERING - WOOD	_		3,640.68	1,820.35	1,820.33
Coverage: Dwelling	<u>@</u>	100.00% =	3,640.68		
FINISH CARPENTRY / TRIMWORK			834.96	27.85	807.11
Coverage: Dwelling	<u>a</u>	100.00% =	834.96		
FINISH HARDWARE			189.99	9.62	180.37
Coverage: Dwelling	<u>a</u>	100.00% =	189.99		
FIREPLACES			5,720.00		5,720.00
Coverage: Dwelling	<u>@</u>	100.00% =	5,720.00		
FRAMING & ROUGH CARPENTRY			2,792.16	22.39	2,769.77
Coverage: Dwelling	<u>a</u>	100.00% =	2,792.16		
HEAT, VENT & AIR CONDITIONING			1,017.43	23.93	993.50
Coverage: Dwelling	<u>a</u>	100.00% =	1,017.43		
INSULATION			137.38	0.75	136.63
Coverage: Dwelling	<u>@</u>	100.00% =	137.38		
LABOR ONLY			7,691.58		7,691.58
Coverage: Dwelling	(a)	100.00% =	7,691.58		,
LIGHT FIXTURES	_		84.34	12.65	71.69
Coverage: Dwelling	<u>@</u>	100.00% =	84.34		
LANDSCAPING	_		264.48		264.48
Coverage: Other Structures	<u>@</u>	100.00% =	264.48		
MASONRY	~		19,027.00	1,268.47	17,758.53
Coverage: Dwelling	<u>@</u>	100.00% =	19,027.00	,	,
RIFFIN_USA_DAMAGE1	-			8/23/2022	Page:

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## USA DAMAGE RESPONSE TEAM

1450 Madruga Ave. Suite 407 Coral Gables, FL www.usadamageresponse.com

O&P Items			RCV	Deprec.	ACV
MIRRORS & SHOWER DOORS			375.40	40.98	334.42
Coverage: Dwelling	<u>a</u>	100.00% =	375.40		
PLUMBING			1,570.82	180.04	1,390.78
Coverage: Dwelling	(a)	100.00% =	1,570.82		,
PAINTING			1,692.61	112.84	1,579.77
Coverage: Dwelling	(a)	100.00% =	1,692.61	112101	2,2
ROOFING			1,351.79	104.67	1,247.12
Coverage: Dwelling	(a)	100.00% =	1,351.79	101.07	1,2-17.112
SIDING		100.0070	1,616.76	299.35	1,317.41
Coverage: Dwelling	(a),	100.00% =	1,616.76	299.33	1,317.41
	w	100.0070 —		22.04	264.65
SOFFIT, FASCIA, & GUTTER	(a)	100.000/	288.59	23.94	264.65
Coverage: Dwelling	<u>@</u>	100.00% =	288.59		
TOILET & BATH ACCESSORIES		100.000/	218.36	50.97	167.39
Coverage: Dwelling	@	100.00% =	218.36		
TILE			2,977.44	99.24	2,878.20
Coverage: Dwelling	<u>@</u>	100.00% =	2,977.44		
TEMPORARY REPAIRS			218.00		218.00
Coverage: Dwelling	<u>@</u>	100.00% =	218.00		
WINDOW TREATMENT			115.30	24.92	90.38
Coverage: Dwelling	<u>a</u>	100.00% =	115.30		
WINDOWS - VINYL			993.00		993.00
Coverage: Dwelling	(a)	100.00% =	993.00		
WATER EXTRACTION & REMEDIATION	0		1,081.12		1,081.12
Coverage: Dwelling	<u>@</u>	100.00% =	1,081.12		1,001112
O&P Items Subtotal			74,757.30	4,958.49	69,798.81
Non-O&P Items			RCV	Deprec.	ACV
PERMITS AND FEES			1,020.00		1,020.00
Coverage: Dwelling	(a)	100.00% =	1,020.00		1,020.00
PLUMBING	•	100.0070	9,952.00		9,952.00
Coverage: Dwelling	(a)	100.00% =	9,952.00		7,732.00
Non-O&P Items Subtotal			10,972.00	0.00	10,972.00
O&P Items Subtotal			74,757.30	4,958.49	69,798.81
Material Sales Tax			1,658.62	176.19	1,482.43
Coverage: Dwelling	(a)	100.00% =	1,658.62	170.17	1,402.40
Storage Rental Tax	w	100.0070	8.56		8.56
Coverage: Dwelling	(a)	100.00% =	8.56		0.50
Overhead	w	100.0070	7,642.64		7,642.64
Coverage: Dwelling	<u>@</u>	99.65% =	7,616.19		7,072.07
Coverage: Other Structures	(a)	0.35% =	26.45		
co, orage. Oraci baractures	w	0.55/0	7,642.64		7,642.64
Profit			7,0 12.07		, , <del>,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,</del>
Profit Coverage: Dwelling	(a)	99.65% =	7 616 19		
Profit Coverage: Dwelling Coverage: Other Structures	@ @	99.65% = 0.35% =	7,616.19 26.45		

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### USA DAMAGE RESPONSE TEAM

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Total 102,681.76 5,134.68 97,547.08

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### **USA DAMAGE RESPONSE TEAM**

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1 39-3812260913\_640x360



2 40-3812260915\_640x360



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### USA DAMAGE RESPONSE TEAM

1450 Madruga Ave. Suite 407 Coral Gables, FL www.usadamageresponse.com

3 41-3797758908\_640x480



4 42-3797758910\_640x480



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### **USA DAMAGE RESPONSE TEAM**

1450 Madruga Ave. Suite 407 Coral Gables, FL www.usadamageresponse.com

5 43-3797758912\_640x480



6 44-3797758914\_640x480



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### **USA DAMAGE RESPONSE TEAM**

1450 Madruga Ave. Suite 407 Coral Gables, FL www.usadamageresponse.com

7 45-3797758916\_640x480



8 46-3797758918\_640x480



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### USA DAMAGE RESPONSE TEAM

1450 Madruga Ave. Suite 407 Coral Gables, FL www.usadamageresponse.com

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### USA DAMAGE RESPONSE TEAM

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11 49-3797758924\_640x480



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### **USA DAMAGE RESPONSE TEAM**

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### **USA DAMAGE RESPONSE TEAM**

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### USA DAMAGE RESPONSE TEAM

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### USA DAMAGE RESPONSE TEAM

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### USA DAMAGE RESPONSE TEAM

1450 Madruga Ave. Suite 407 Coral Gables, FL www.usadamageresponse.com

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### **USA DAMAGE RESPONSE TEAM**

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24 62-3797759214\_640x360



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### USA DAMAGE RESPONSE TEAM

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### **USA DAMAGE RESPONSE TEAM**

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28 66-3797759222\_640x360



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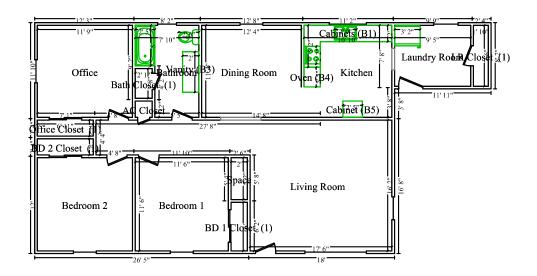
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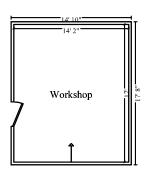
1450 Madruga Ave. Suite 407 Coral Gables, FL www.usadamageresponse.com

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SKETCH1 - Main Level



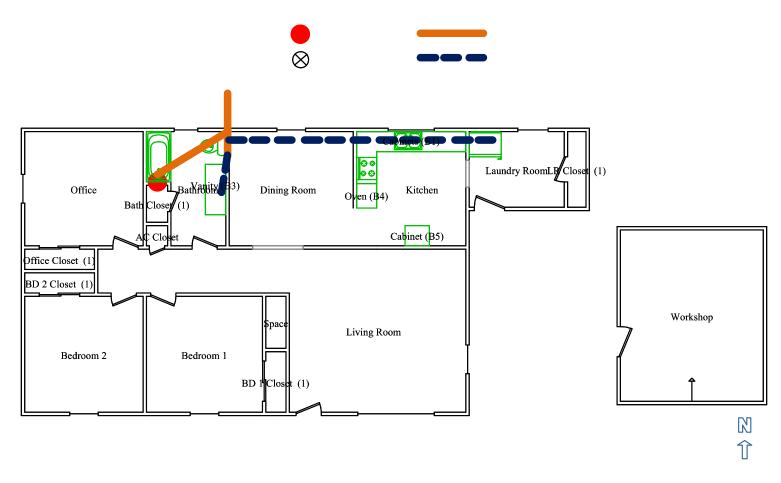


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Main Level

SKETCH2 - Plumbing Diagram



Plumbing Diagram

Case 1:21-cv-02818-STA-jay Document 29-17 Filed 01/18/23 Page 55 of 60 PageID

DRAINGO OF MISSISSIPPI, LLC 6883 HWY 14, BRIGHTON, TN 38011 draingoplumbing@gmail.com 601-899-0000

#### **PLUMBING REPORT**

**SUBJECT PROPERTY:** 

Name William Griffin
Address 128 Poplar St.
City, State, Zip Gadsden, TN 38337

#### Introduction:

We performed a camera inspection at the above referenced property on the date noted. The purpose of this video inspection was to evaluate the condition of the homes sanitary drainage system and the following are our findings.

**System drains into:** Septic Tank

Cast Iron goes to septic tank and septic tank is

**Foundation Type:** Off Grade / Crawl Space under slab of porch. House is conventional

**Plumbing System Type:** Plumbing system is comprised of both cast iron and PVC.

**ANALYSIS OF CAMERA INSPECTION ON:** August 10, 2020

OBSERVATIONS LOCATIONS OBSERVED

Possible field line issue Broken going into septic tank. It's offset separated at

the tank.

Under porch slab

The interior of the cast iron drainage line is extremely rough and jagged.

DRAINGO OF MISSISSIPPI, LLC 6883 HWY 14, BRIGHTON, TN 38011 draingoplumbing@gmail.com 601-899-0000

#### **DAMAGE IDENTIFIED:**

MASTER BATHROOM:	Cabinet Damage or other wood damage
------------------	-------------------------------------

**CONCLUSION:** 

We believe the existing pipes should be repaired.

#### **Additional Comments:**

Only bathroom with Cast Iron. It was grooved and deteriorated and we recommend replacing the Cast Iron. Much of the piping is PVC throughout the rest of the home. Vent to Master Bathroom is Cast Iron and should be replaced.

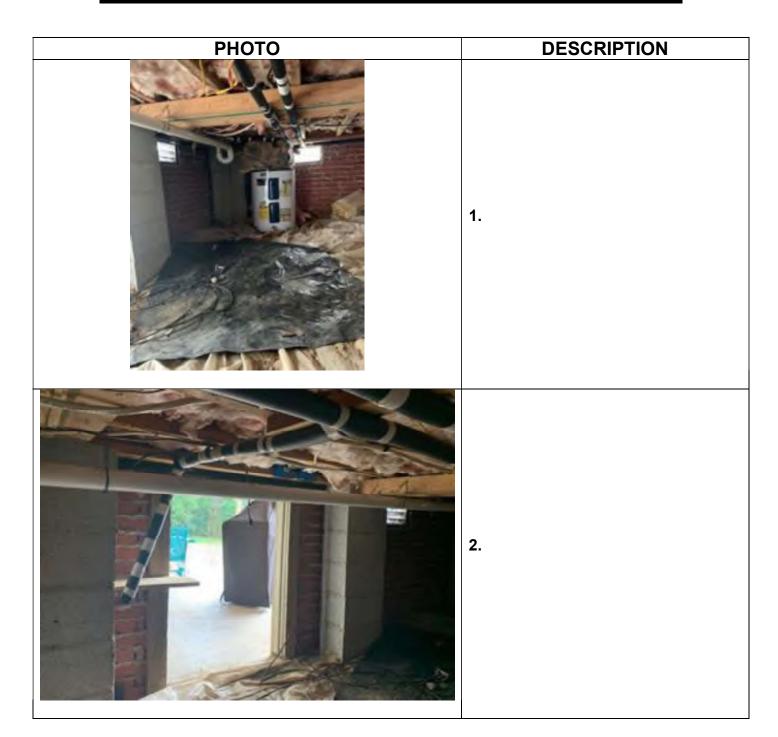
#### ESTIMATED COST TO RE-PLUMB SANITARY DRAIN LINES TO PVC: \$9,952.00

Thanks for using our services,

**Draingo Plumbing** 

All observations are the opinion of the Contractor. Opinions are based on collected information and if new information becomes available the Contractor reserves the right to change this opinion.

## **PICTURES WITH DESCRIPTIONS**





3.

PHOTO DESCRIPTION



4.

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5.

### **DRAINGO OF MISSISSIPPI**

### **ESTIMATE**

6883 HWY 14

**BRIGHTON TN 38011** 

Phone: 601) 899-0000

INVOICE # DATE 9691803 6/9/2020

**CUSTOMER ID** 

564

TERMS

**CUSTOMER** 

USA DAMAGE RESPONSE TEAM WILLIAM GRIFFIN 128 POPLAR ST GADSDEN TN 38337

DESCRIPTION	QTY	UNIT PRICE	AMOUNT
REMOVE AND SET ALL FIXTURES		745.00	1,490.00
CREATE ACCESS AND REMOVE CAST IRON PIPE		45.00	720.00
INSTALL SANITARY PIPE LABOR		81.00	1,296.00
TRASH CONTAINER		900.00	900.00
PREPARING PLANS, PLUMIBING PERMIT, INSPECTIONS AND SUBMISSIONS		1,800.00	1,800.00
SUPPORT HANGERS		450.00	450.00
TRAVEL TIME TO THE LOCATION		100.00	400.00
MATERIAL INCLUDING PVC SCH 40 PIPE AND FITTINGS		150.00	450.00
VENT STACK & WASTE ARM INSTALL	2	823.00	1,646.00
CUT CONCRETE, REMOVE AND DISCARD (APPROX FT)	8	100.00	800.00
			-
			-
			-
Thank you for your business!	SUBTOTAL		9,952.00
		ATE	0.000%
			-
		<b>AL</b>	\$ 9,952.00

If you have any questions about this invoice, please contact DGMS 601-899-0000 DRAINGOPLUMBING@GMAIL.COM